

# EXHIBIT A



**U.S. Department of Justice**

*United States Attorney*

*Eastern District of Pennsylvania*

*Direct Dial: (215) 861-8499  
Facsimile: (215) 861- 8618  
E-mail Address: jason.bologna@usdoj.gov*

*615 Chestnut Street  
Suite 1250  
Philadelphia, Pennsylvania 19106-4476  
(215) 861-8200*

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Joseph Poluka, Esq.  
One Logan Square  
130 North 18<sup>th</sup> Street  
Philadelphia, PA 19103

Frank DeSimone, Esq.  
1880 John F. Kennedy Boulevard  
Suite 600  
Philadelphia, PA 19103

Tom Ivory, Esq.  
1500 Market Street  
Suite 1200  
Philadelphia, PA 19102

Susan Lin, Esq.  
The Cast Iron Building  
718 Arch Street, Suite 501 South  
Philadelphia, PA 19106

Brian McMonagle, Esq.  
McMonagle, Perri, McHugh & Mischak  
1845 Walnut Street, 19<sup>th</sup> Floor  
Philadelphia, PA 19103

Rhonda Lowe, Esq.  
3553 West Chester Pike  
Suite 126  
Newtown Square, PA 19073

Hope Lefeber, Esq.  
2 Penn Center, Suite 1205  
1500 John F. Kennedy Boulevard  
Philadelphia, PA 19102

Jeremy Alva, Esq.  
1520 Locust Street  
Suite 700  
Philadelphia, PA 19102

Jack McMahon, Esq.  
139 North Croskey Street  
Philadelphia, PA 19103

Kevin Birley, Esq.  
2 East Penn Square, Suite 1313  
Philadelphia, PA 19102

Lawrence Bozelli, Esq.  
211 North 13<sup>th</sup> Street  
Philadelphia, PA 19107

David Bahuriak, Esq.  
518 South 3<sup>rd</sup> Street  
Philadelphia, PA 19147

Carmen C. Nasuti, III, Esq.  
1500 Market Street, Suite 2727  
Philadelphia, PA 19102

**Re: United States v. Mehdi Nikparvar-Fard, et. al.  
Criminal No. 18-101  
Discovery Production One – Patient Files and Expert Report**

Dear Counsel:

I am enclosing 2 CDs that contain discovery in the above-captioned case. Please note that you will need to use the password [REDACTED] to open these discs, as well as all

future discovery productions.

On Disc 1, you will find an expert report and Advanced Urgent Care (AUC) pain management patient files. The Bates numbers for this discovery begin at USAO-000001 and end at USAO-031038.

On Disc 2, you will find additional AUC pain management files (that are referenced in the expert's report). The Bates numbers for this discovery begin at USAO-031039 and end at USAO-067956.

If you have any difficulty finding any of the information contained on these 2 CDs, please call me immediately. Please note that we are producing the patient files in the condition they were found in (when seized via federal search warrants). Also, please note that some AUC pain management patients have multiple files. You will see many examples of this on the 2 CDs.

This is the first in a series of discovery productions in this case. To the extent possible, I will try to produce discovery in batches that will be mailed approximately every two weeks. I hope to complete the vast majority of discovery production by the middle of March.

A significant amount of work has already been done on forthcoming discovery productions. Some of the discovery is subject to additional legal requirements (e.g., redactions on certain paperwork). We are working to address these issues, and I anticipate providing additional discovery to you in the near future.

The government acknowledges its duty to produce Brady material.

Jencks material will be produced six weeks before trial.

I anticipate there will be Fed.R.Evid. 404(b) materials, and I will write separately at a later date to address the specific evidence the government will seek to admit at trial.

Pursuant to Rule 16(b), the government demands prompt reciprocal production of documents, tangible objects and reports of examinations and tests as defined in that Rule.

The government demands reciprocal disclosure of Jencks materials per Rule 26.2 and United States v. Nobles, 422 U.S. 225 (1975).

Your client is charged with offenses, the time, date and place of which are detailed in the charging document. Pursuant to Rule 12.1, the government demands prompt written notice of any defense alibi within ten (10) days of the receipt of this demand. This notice should detail the specific place or places at which the defendant claims to have been at the time of the offense and the names and addresses of all witnesses upon whom the defendant intends to rely to establish such an alibi.

Pursuant to Rule 12.2, the government demands prompt written notice of any planned insanity or mental defect defense, and/or expert testimony of the defendant's mental condition.

The government demands prompt notice of any entrapment defense per United States v. Levin, 606 F.2d 47, 49 (3d Cir. 1979).


Components of the Department of Justice, including this Office, periodically post content on social media websites such as Twitter. These social media websites may allow members of the public to post publicly accessible, user-generated comments in response to the Department's postings. This Office does not own these social media websites or control user-generated comments. Nor does this Office regularly moderate, censor, monitor, review, or delete any user-generated comments in the ordinary course. Ofcourse, you may directly access these websites at your convenience in the event you believe they may contain information that is relevant to this case.

The government is willing to discuss a possible pretrial disposition of this matter involving a guilty plea to the charges listed in the Indictment. This does not constitute an offer. All such discussions are contingent on the approval of the United States Attorney.

Thank you for your time and attention in this matter.

Sincerely yours,

WILLIAM M. MCSWAIN  
United States Attorney

  
JASON P. BOLOGNA  
SETH SCHLESSINGER  
Assistant United States Attorneys